## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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SIDNEY GORDON,

Plaintiffs,

- V. -

11-cv-9665 (JSR)

SONAR CAPITAL MANAGEMENT LLC, NOAH FREEMAN, NEIL DRUKER, PRIMARY GLOBAL RESEARCH, LLC, THE JOHN DOE HEDGE FUND(S), and JOHN AND JANE DOES 1 THROUGH 100,

Defendants.

Defendants.

## NOTICE OF NOAH FREEMAN'S MOTION TO DISMISS THE AMENDED CLASS ACTION COMPLAINT

PLEASE TAKE NOTICE that, upon the Amended Class Action Complaint, filed April 24, 2012, in the above-captioned action, the accompanying Memorandum of Law of Defendant Noah Freeman In Support of His Motion to Dismiss the Amended Class Action Complaint, dated May 15, 2012, and all prior papers and proceedings herein, defendant Noah Freeman ("Freeman"), by and through his undersigned counsel, will move this Court pursuant to Rule 12(b) of the Federal Rules of Civil Procedure before the Honorable Jed S. Rakoff, at the United States Courthouse, 500 Pearl Street, New York, New York, on June 19, 2012, at 4:30 pm, or as soon thereafter as counsel may be heard for an Order dismissing the Amended Class Action Complaint with prejudice and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE THAT opposition papers shall be served and filed on or before June 5, 2012; reply papers shall be served and filed on or before June 12, 2012; and oral argument shall be held on June 19, 2012 at 4:30 p.m.

Dated: New York, New York May 15, 2012

## DECHERT LLP

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## **CERTIFICATE OF SERVICE**

I hereby certify that I served the Notice of Noah Freeman's Motion To Dismiss the Amended Class Action Complaint by first class mail on this 15th day of May, 2012, to:

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